

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUTTES

VICTIM RIGHTS LAW CENTER, et al.,

Plaintiffs,

v.

U.S. DEPARTMENT OF EDUCATION,  
et al.,

Defendants.

Civil Action No. 25-11042-MJJ

**DECLARATION OF RACHEL OGLESBY**

1. My name is Rachel Oglesby. I make this Declaration based on my own personal knowledge, on information contained in the records of the Department of Education, or on information provided to me by Department of Education employees.
2. I am currently employed as Chief of Staff for the U.S. Department of Education, headquartered in Washington, D.C. I began my service at the Department on January 20, 2025.
3. Before joining the Department, I worked at America First Policy Institute as the Chief State Action Officer and Director of the Center for the American Worker.
4. In my role at the Department, I have the following responsibilities:
  - a. I assist the Secretary of Education with all her responsibilities running the Department.
  - b. I advise the Secretary on significant matters within and affecting the Department.
5. I submitted declarations in the cases of *New York v. McMahon*, Case No. 25-10601-MJJ and *Somerville Public Schools v. Trump*, Case No. No. 25-10677-MJJ, on June 3, 2025, June 10, 2025, June 17, 2025, June 24, 2025, July 1, 2025, and July 8, 2025, the latter two of which included compliance information specific to the preliminary injunction issued by this Court on June 18, 2025 regarding the Department's Office for Civil Rights (the "OCR Order"). I further submitted declarations in this case regarding the OCR Order on July 15, July 22, 2025, and July 29, 2025 (which due to technical difficulties was, I believe, filed July 30). I incorporate herein by reference the statements made in my previous declarations. Due to the stay ordered by the United States Supreme Court issued on July 14, 2025, in the

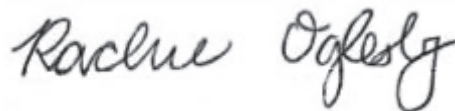
aforementioned *New York* and *Somerville* cases, this declaration addresses compliance activities specific to the OCR Order.

6. Senior officials from the ad hoc committee described in my earlier declarations held discussions on August 4, 2025, addressing OCR-specific reintegration activities. By August 5, 2025, the Department had:
- Implemented August 1, 2025, separation of employment for employees who received RIF notices on March 11, 2025, while ensuring that reintegration plans continue to be implemented as to OCR employees who received RIF notices on March 11, 2025.
    - Accounted for SES employees who received RIF notices on March 11, 2025, including any within OCR, to implement the placement rights to which SES employees are entitled.
  - To ensure that employees have restored and updated government furnished equipment (GFE), the Department mailed out approximately 365 boxes to employees who had retained GFE, including to those OCR employees who will need to return GFE in exchange for GFE units that have been properly updated.
  - Verified that existing IT contracts are scoped to provide tech support for reintegrated employees who will need to work remotely due to regional office space being unavailable (or due to other reasons, such as telework as a reasonable accommodation, or residence outside a 50-mile radius from Department-occupied facility).
  - Continued to pay the salaries and benefits of OCR employees who received RIF notices on March 11, 2025, and have been on paid administrative leave since March 21, 2025, at a cost to the Department of nearly \$1 million per week.
  - Ensured that OCR continues to process, investigate, and resolve complaints:
    - From March 11 to August 4, 2025, OCR received 6,495 complaints; opened 377 for investigation; opened 27 directed investigations; dismissed 4,530 complaints consistent with OCR's Case Processing Manual; resolved 108 complaints after investigation concluded insufficient evidence for findings; and resolved 385 complaints with voluntary agreements, OCR-mediated settlements, or technical assistance from OCR to ensure a recipient's digital resources are accessible to students with disabilities.

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I declare under penalty of perjury that the foregoing is true and correct.

Executed in Washington, DC this 5<sup>th</sup> day of August.



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Rachel Oglesby